

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION

No. 4:24-cr-00016-M-BM

UNITED STATES OF AMERICA

v.

SINA GHOLINEJAD

UNOPPOSED  
MOTION TO MOVE TO  
NEW FACILITY

Sina Gholinejad, by and through undersigned counsel, respectfully requests the Court to direct the United States Marshal Service to move Mr. Gholinejad from Brunswick County Jail to New Hanover County Jail. The following is offered in support of this motion:

1. On April 4, 2024, Mr. Gholinejad was named in a Criminal Indictment which charged him with fraud and money laundering.
2. The Office of the Federal Public Defender was appointed to represent Mr. Gholinejad on January 15, 2025. Defense counsel filed her Notice of Appearance on January 15, 2025.
3. Mr. Gholinejad is currently in the custody of the United States Marshals Service and is being housed in the Brunswick County Jail in Bolivia, North Carolina.
4. On February 24, 2025, a notice of hearing was filed and set the arraignment for March 12, 2025, in Wilmington.
5. This case remains sealed and there is a protective order regarding the discovery. Defense counsel requests this move due to the anticipated large amounts of discovery and Mr. Gholinejad not being able to keep his own copy. Multiple visits will have to be made each week and New Hanover County is located closer to undersigned counsel and has more hospitable meeting facilities for reviewing voluminous discovery.

6. Moving Mr. Gholinejad to New Hanover County would save 56 miles<sup>1</sup> of travel each trip, resulting in a more efficient use of time and resources, and will hopefully allow the case to progress in a more timely fashion.
7. Assistant United States Attorney Bradford Devoe has been contacted and has no objection to the continuance requested herein.

Mr. Gholinejad respectfully requests the United States Marshals Service move him to New Hanover County.

Respectfully submitted this 25th day of February, 2025.

G. ALAN DuBOIS  
Federal Public Defender

/s/ Diana H. Pereira  
DIANA H. PEREIRA  
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N.C. State Bar No. 32615  
LR 57.1 Counsel Appointed

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<sup>1</sup> The distance from undersigned counsel's office at 150 Fayetteville Street, Raleigh, to Brunswick County Jail is 151 miles, whereas the distance to New Hanover County Jail is 123 miles.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

BRADFORD DEVOE  
United States Attorney's Office - EDNC  
150 Fayetteville Street, Suite 2100  
Raleigh, NC 27601

by hand-delivering and/or by email a copy of same.

This the 25th day of February, 2025.

/s/ Diana H. Pereira  
DIANA H. PEREIRA  
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LR 57.1 Counsel Appointed